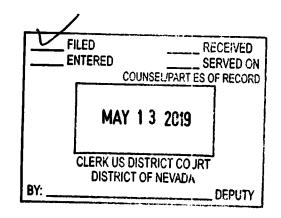
AARON D. FORD 1 Attorney General IAN E. CARR, Bar No. 13840 Deputy Attorney General State of Nevada 3 Bureau of Litigation Public Safety Division 4 100 N. Carson Street Carson City, Nevada 89701-4717 5 Tel: (775) 684-1259 E-mail: icarr@ag.nv.gov 6 Attorneys for Defendants 7 Tara Carpenter, E.K. McDaniel,



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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GEOFFREY GROVE.

and Mark Sorci

Plaintiff.

14 v.

E.K. MCDANIEL, et al.,

Defendants

DROFT

Case No. 3:17-cv-00245-RCJ-CBC

MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS

(First Request)

Defendants, Tara Carpenter, E.K. McDaniel, and Mark Sorci (Defendants), by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Ian E. Carr, Deputy Attorney General, hereby submit their Motion for Extension of Time to File Dispositive Motions. This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully request a thirty (30) day extension of time out from the current deadline (May 8, 2019) to file dispositive motions in this case. Defense counsel is confronted with numerous competing deadlines and a high workload due to staffing However, such obstacles are changes in the Office of the Attorney | General.

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Case 3:17-cv-00245-RCJ-CBC Document 28 Filed 05/08/19 Page 2 of 3

currently being resolved and the requested extension of time should afford Defendants adequate time to file dispositive motions in this case.

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will allow for a thorough briefing to narrow or eliminate issues in this case. The requested thirty (30) day extension of time should permit Defendants time to adequately research draft, and submit dispositive motions in this case. Defendants assert that the requisite good cause is present to warrant the requested extension of time.

For these reasons, Defendants respectfully request a thirty (30) day extension of time from the current deadline to file dispositive motions in this case, with a new deadline to and including Friday, June 7, 2019.

DATED this 8th day of May, 2019.

AARON D. FORD Attorney General

By:

IAN E. CARR
Deputy Attorney General
State of Nevada
Bureau of Litigation
Public Safety Division
Attorneys for Defendants

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TVIS SO ORDERED.

MAGISTRATE JUDGE

DATED:<u>57/*3/2*)/9</u>